

United States Bankruptcy Court  
Eastern District of Virginia  
Richmond Division

In RE:  
Monica Elaine Torrance, a/k/a Monica  
Torrance a/k/a Monica E Torrance

BCN#: 16-34141-KRH  
Chapter: 13

Debtor

RESPONSE TO DEBTOR'S MOTION TO SELL

Comes now Wells Fargo Bank, NA ("Creditor"), by Counsel, and for its response to the Debtor's Motion to Sell Real Property states as follows:

1. That Wells Fargo Bank, NA holds a first priority deed of trust secured by real property located at 10864 WHITE DOGWOOD DRIVE, Providence Forge, VA 23140.
2. That Creditor consents to the sale of the real property located at 10864 WHITE DOGWOOD DRIVE, Providence Forge, VA 23140, which is secured by a deed of trust held by Wells Fargo Bank, NA, provided that there are sufficient proceeds to pay its underlying note and deed of trust in full through settlement.
3. Further, that Creditor requests that all proceeds from the sale of the property be used to pay Wells Fargo Bank, NA in full, full including its outstanding fees and costs due and owing at the date of settlement. Nothing contained herein shall prevent the Secured Creditor from proceeding to foreclosure upon obtaining relief from the Automatic Stay.
4. To the extent that the proceeds of the sale are insufficient to pay its underlying note and deed of trust in full including its fees and costs at settlement, then Wells Fargo Bank, NA is opposed to the Motion to Sell Real Property.

Dated: 01/28/2021

LOGS LEGAL GROUP LLP

Attorneys for Wells Fargo Bank, NA

/s/ Mary F. Balthasar Lake

By: \_\_\_\_\_

Malcolm B. Savage, III, Esquire

VSBS #91050

William M. Savage, Esquire

VSBS #26155

Mary F. Balthasar Lake, Esquire

VSBS #34899

Gregory N. Britto, Esquire

VSBS #23476

Counsel for Movant

CERTIFICATE OF SERVICE

I hereby certify that on the 28<sup>th</sup> day of January, 2021 the following person(s) were served a copy of the foregoing in the manner described below:

Via CM/ECF Electronic Notice:

Charles H Krumbein, Krumbein Consumer Legal Services, Inc. Debtor's Attorney  
1650 Willow Lawn Dr.  
Suite 300  
Richmond, VA 23230

Suzanne E. Wade Chapter 13 Trustee  
7202 Glen Forest Drive  
Suite 202  
Richmond, VA 23226

Via First Class Mail, Postage Prepaid:

Monica Elaine Torrance a/k/a Monica Torrance a/k/a Monica E Debtor(s)  
Torrance  
10864 WHITE DOGWOOD DRIVE  
Providence Forge, VA 23140

/s/ Mary F. Balthasar Lake

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